

# EXHIBIT B

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7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF LINCOLN

8 OHIO CASUALTY INSURANCE  
9 CORPORATION, as Subrogee of IRIEN  
10 JENNINGS DBA TOMFOOLERY PIZZA  
PUB,

11 Plaintiff,

12 vs.

13 APPLE INC.,  
14

15 Defendant.

NO. 19-2-00024-5

NOTICE OF REMOVAL TO PLAINTIFF

16 TO: OHIO CASUALTY INSURANCE CORPORATION, as Subrogee of IRIEN  
17 JENNINGS DBA TOMFOOLERY PIZZA PUB, Plaintiff,

18 AND TO: Kevin F. Smith of Law Offices of Mark Dietzler, its attorneys.

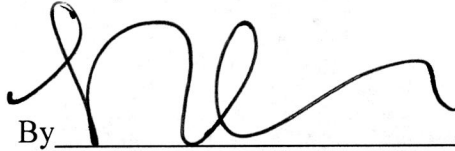
19 You are hereby notified that on the 31<sup>st</sup> day of May, 2019, Apple Inc., defendant, filed a  
20 Notice of Removal of the action originally brought by plaintiff in the Superior Court of  
21 Washington for Lincoln County, Cause No. 19-2-00024-5, with the United States District Court  
22 for the Eastern District of Washington; so that this action has been removed from the Superior  
23 Court to the United States District Court. A copy of the Notice of Removal is attached and  
24 herewith served upon you.  
25

NOTICE OF REMOVAL TO PLAINTIFF - 1 -

Betts  
Patterson  
Mines  
One Convention Place  
Suite 1400  
701 Pike Street  
Seattle, Washington 98101-3927  
(206) 292-9988

1 DATED this 31st day of May, 2019.

2 BETTS, PATTERSON & MINES, P.S.

3 

4 By

5 Christopher W. Tompkins, WSBA #11686

6 Natasha A. Khachatourians, WSBA #42685

7 Attorneys for Defendant

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NOTICE OF REMOVAL TO PLAINTIFF

- 2 -

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Suite 1400  
701 Pike Street  
Seattle, Washington 98101-3927  
(206) 292-9988

CERTIFICATE OF SERVICE

I, Karen L. Pritchard, declare as follows:

1) I am a citizen of the United States and a resident of the State of Washington. I am over the age of 18 years and not a party to the within entitled cause. I am employed by the law firm of Betts, Patterson & Mines, P.S., whose address is One Convention Place, Suite 1400, 701 Pike Street, Seattle, Washington 98101-3927.

2) By the end of the business day on May 31, 2019, I caused to be served upon counsel of record at the addresses and in the manner described below, the following document:

- Notice of Removal to Plaintiff; and
- Certificate of Service.

***Counsel for Plaintiff Ohio Casualty Insurance Corporation***

Kevin F. Smith

Law Offices of Mark Dietzler

1001 4th Ave Ste 3300

Seattle, WA 98154-1101

[kevinf.smith@libertymutual.com](mailto:kevinf.smith@libertymutual.com)

☐ U.S. Mail

☒ Hand Delivery


☐ Facsimile

☐ Overnight

☒ Email

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 31st day of May, 2019.

  
Karen L. Pritchard, Legal Assistant